

**EXHIBIT B**

**SECOND AMENDED SUMMARY OF WORK PERFORMED**

**VENABLE LLP**

**SECOND AMENDED SUMMARY OF WORK PERFORMED AND TIME ALLOCATED**

<b>WORK PERFORMED</b>	<b>ESTIMATE<sup>1</sup> OF HOURS BILLED</b>	<b>AMOUNT BILLED</b>
Expanding Scope of Examiner's Investigation/Mediation Request	61	\$62,118.00
Ponzi and Substantive Consolidation Complaint Matters	269.4	\$273,630.00
Class Claim Matters	220.1	\$255,706
Mediation/Plan Term Sheet/Plan Support Agreement Matters	507.9	\$609,334.00
Other <sup>2</sup>	161.3	\$182,301.00
<b>TOTAL FEES BILLED THROUGH 9/11/23</b>	<b>1,219.7</b>	<b>\$1,383,089.00</b>
ADDITIONAL FEES BILLED THROUGH 11/9/23 <sup>3</sup>	97.9 <sup>3</sup>	\$194,860.50 <sup>3</sup>
ADDITIONAL FEES BILLED THROUGH 12/31/23 <sup>3</sup>	128.5 <sup>3</sup>	\$180,991.00 <sup>3</sup>
<b>TOTAL FEES BILLED THROUGH 12/31/23</b>		<b>\$1,758,940.50</b>
<b>TOTAL COSTS INCURRED THROUGH 12/31/2023</b>		<b>\$7,175.45</b>
TOTAL FEE REIMBURSEMENT REQUESTED IN APPLICATION (assuming only \$300,000 in estimated additional fees)		\$1,683,089.00 <sup>4</sup>
<b>TOTAL AGREED UPON REDUCED CLAIM</b>		<b>\$1,436,408.60<sup>4</sup></b>

<sup>1</sup> The hours billed are an estimate, because Venable did not initially know that it would be filing an application for substantial contribution and would need to bill each task individually, so most of its time entries contain blocks of several tasks related to different categories of work. The estimates are a good faith effort, after having reviewed each time entry, at estimating how much of a single entry would likely be attributable to one of the categories of work set forth in this Summary.

<sup>2</sup> The "Other" category reflects work needed to be performed by Venable to be prepared for participating in the case, such as reviewing pleadings, internal strategy conferences, and conferring generally with estate professionals. For example, it would have been impossible to have participated meaningfully in the Mediation had Venable not been reviewing proposed settlement agreements, versions of proposed chapter 11 plans, and other pleadings relevant to critical issues. The "Other" category does not include any work performed in connection with (i) Mr. Tuganov's proofs of claim, (ii) work performed in connection with stablecoin sales, (iii) work performed in connection with the bid procedures, the auction, or the sale of any assets, or (iv) work performed in connection with the substantial contribution application.

<sup>3</sup> All additional time was devoted to Plan Support Agreement matters.

<sup>4</sup> See Third Supplement To Application of Ignat Tuganov For Allowance and Reimbursement of Reasonable Professional Fees and Actual Necessary Expenses ¶ 7.